IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

Uri Reisman,)
Plaintiff,) C.A. No. 3:24-cv-02451-SAL-PJG
v.) JOINT RULE 26 DISCOVERY PLAN
University of South Carolina, Sonya Singleton, and Mary Grace Strickland,)))
Defendants.)))

The parties, having conferred as directed by the Court in its Conference and Scheduling Order filed **May 1, 2024**, propose the following pursuant to Rule 26(f), Fed. R. Civ. P.:

- (1) The parties have agreed to waive the disclosures required by Rule 26(a)(1) and to pursue such information through ordinary discovery.
- (2) The parties anticipate the need for discovery on both liability and damages and believe that discovery can be completed by the date set forth in the proposed Consent Amended Scheduling Order.
- (3) The parties are currently not aware of any unusual issues with regard to the disclosure or discovery of electronically stored information.
- (4) The parties are currently not aware of any unusual issues with regard to claims of privilege or of protection as to trial-preparation materials.
- (5) The parties do not believe that any change in the limitations on discovery imposed under the Federal Rules of Civil Procedure or local rules is necessary.
- (6) The parties are not aware of any other orders under Rule 26(c) or Rule 16(b) and(c) that are necessary or appropriate at this time.

s/ J. Paul Porter

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June 4, 2024